

**Hearing Date and Time: May 20, 2010 at 10:00 a.m. (prevailing Eastern time)**

**HASKELL SLAUGHTER YOUNG & REDIKER, LLC**

2001 Park Place North  
Suite 1400  
Birmingham, Alabama 35203  
Robert H. Adams

Attorney for SIMCO Construction, Inc.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
:  
**In re:** : **Chapter 11**  
:  
**DELPHI CORPORATION, et al.,** : **Case No.: 05-44481 (RDD)**  
:  
**Debtor.** : **(Jointly Administered)**  
-----X  
**DELPHI CORPORATION,** :  
:  
**Plaintiffs,** : **Adv. Pro. No. 07-02625-rdd**  
v. :  
**SIMCO CONSTRUCTION, INC.** :  
:  
**Defendant.** :  
-----X

**SIMCO CONSTRUCTION, INC.'S JOINDER TO THE  
LIMITED OBJECTION OF MICROCHIP TECHNOLOGY  
INCORPORATED TO REORGANIZED DEBTORS' MOTION  
FOR A CASE MANAGEMENT ORDER ESTABLISHING  
PROCEDURES GOVERNING ADVERSARY PROCEEDINGS**

TO THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE

COMES NOW, SIMCO Construction, Inc. ("SIMCO"), by and through its attorneys Haskell Slaughter Young & Rediker, LLC, and hereby joins in the Limited Objection of Microchip Technology Incorporated (the "Objection") to Reorganized

Debtors' Motion for a Case Management Order Establishing Procedures Governing Adversary Proceedings (the "Motion") [Docket No. 19794]. In support of its Joinder in the Objection, SIMCO submits the following:

1. SIMCO is the Defendant in the above styled adversary proceeding which was commenced by the predecessors of the Reorganized Debtors on September 29, 2007.
2. For the reasons set forth in the Objection, the Case Management Order proposed by the Reorganized Debtors will unjustly affect SIMCO's ability to defend this adversary proceeding. SIMCO reserves the right to be heard before this Court with respect to the Motion and the relief requested by the Reorganized Debtors therein.

/s/ Robert H. Adams  
Robert H. Adams  
**HASKELL SLAUGHTER YOUNG &  
REDIKER, LLC**  
2001 Park Place North  
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Birmingham, Alabama 35203  
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Debtor. :  
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DELPHI CORPORATION, :  
: Plaintiffs, : Adv. Pro. No. 07-02625-rdd  
v. :  
: SIMCO CONSTRUCTION, INC. :  
: Defendant. :  
-----X

**AFFIDAVIT OF SERVICE**

STATE OF ALABAMA )  
: )  
COUNTY OF JEFFERSON )

Robert H. Adams, being duly sworn deposes and says:

1. I am not a party to this action, am over 18 years of age and reside in Jefferson County, Alabama.

2. On May 7, 2010, I electronically filed **Simco Construction, Inc.'s Joinder to the Limited Objection of Microchip Technology Incorporated to Reorganized Debtors' Motion for a Case Management Order Establishing Procedures Governing Adversary Proceedings** with the Clerk of the Bankruptcy Court using the CM/ECF system.

3. I served a true and correct copy of the foregoing, via the United States Postal Service First Class Mail or electronically through the Court's CM/ECF system, on the following participants and non-participants:

DPH Holdings Corp., et al.  
5725 Delphi Drive  
Troy, Michigan 48098

Eric B. Fisher  
Barry N. Seidel  
Butzel Long, a professional corporation  
380 Madison Avenue, 22<sup>nd</sup> Floor  
New York, New York 10017

Cynthia J. Haffey  
Butzel Long, a professional corporation  
150 West Jefferson, Suite 100  
Detroit, Michigan 48226

Alicia M. Leonhard  
Tracy Hope Davis  
Office of the United States Trustee  
33 Whitehall Street, 21<sup>st</sup> Floor  
New York, New York 10004-2112

Susan Atkins  
Gianni Russello  
JP Morgan Chase Bank, N.A.  
277 Park Avenue, 8<sup>th</sup> Floor  
New York, New York 10172

4. I submitted a true and correct copy of the foregoing via overnight mail to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, Courtroom 118, White Plains, New York 10601-4140.

/s/ Robert H. Adams  
Robert H. Adams

Sworn to before me this  
7<sup>th</sup> day of May, 2010.

/s/ Mary J. Barnette  
Notary Public  
My Commission Expires: 11/17/2013